

September 21, 2020

Via CM-ECF Filing

The Honorable Susan Richard Nelson
United States District Court
for the District of Minnesota
316 N. Robert Street
St. Paul, MN 55101

Re: *3M Company v. Matthew Starsiak, et al.*
Case No.: 0:20-cv-01314-SRN-DTS

Dear Judge Nelson:

We represent Defendants Matthew Starsiak and AMK Energy Services LLC in the above-captioned matter. Pursuant to your request at the September 9, 2020 hearing on Defendants' Rule 12 Motion to Dismiss and Plaintiff's Motion for Preliminary Injunction, we write to provide the Court with Defendants' position regarding a potential stipulation to Plaintiff 3M Company's Motion for Preliminary Injunction, in the event the Court determines it has personal jurisdiction over the Defendants and denies Defendants' Motion.

Although Defendants are not in a position to stipulate to the relief sought in 3M Company's Motion for Preliminary Injunction, the parties are presently engaged in discussions aimed at resolving this matter in its entirety. We therefore respectfully request that the Court defer ruling on either motion for an additional period of two weeks, in order to allow the parties to determine whether resolution is indeed feasible and, if so, to finalize a settlement. We have discussed this proposed ruling deferral with 3M Company's counsel, and they are in agreement with it.

Thank you for your efforts and attention to this matter.

Hon. Susan Richard Nelson
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Respectfully submitted,

MEAGHER & GEER, P.L.L.P.

A handwritten signature in dark ink, appearing to read "R. Vaccaro", written in a cursive style.

Robert W. Vaccaro

cc: John Ursu, Esq.
Kerry Bundy, Esq.
Timothy Schupp, Esq.